



OPERATIONAL MEMO

TITLE:	AMENDED FY 2020-21 CONTINUOUS COVERAGE (CONTINUOUS ELIGIBILITY) PERFORMANCE INCENTIVE
SUPERSEDES NUMBER:	HCPF OM 21-033
EFFECTIVE DATE:	MAY 1, 2021
DIVISION AND OFFICE:	COMMUNICATIONS AND GOVERNMENT RELATIONS, POLICY, COMMUNICATIONS & ADMINISTRATION OFFICE
PROGRAM AREA:	COUNTY RELATIONS AND ADMINISTRATION
KEY WORDS:	LTSS, COVID-19 PUBLIC HEALTH EMERGENCY, REDETERMINATION, ELIGIBILITY, VULNERABLE ELIGIBILITY GROUPS, FAILED TO PROVIDE VERIFICATION
OPERATIONAL MEMO NUMBER: HCPF OM 21-041	
ISSUE DATE: MAY 12, 2021	
APPROVED BY: MARIVEL KLUECKMAN	

HCPF Memo Series can be accessed online: <https://www.colorado.gov/hcpf/memo-series>

Purpose and Audience:

The Department appreciates county feedback and has revised the tracking template for this Performance Incentive. Thus, Operational Memo 21-003 is superseded by this Memo and guidance is amended below.

The purpose of this Operational Memo is to provide guidance to county departments of human/social services (county) on updates to the Continuous Coverage (Continuous Eligibility) Performance Incentive as part of the FY 2020-21 County Incentives Program. The Performance Incentive was updated due to new guidance received from the federal government. The Incentive continues to be weighted at 20 percent of total County Incentives funding.

Background:

At the beginning of the 2020-21 fiscal year, the Continuous Coverage (Continuous Eligibility) Performance Incentive was implemented with an understanding that

members would not be disenrolled due to changes in circumstances until the federal government terminated the COVID-19 public health emergency (PHE), which was tentatively scheduled for January 2021. However, the federal government recently notified all states that they have determined that the PHE will likely remain in place for the entirety of calendar year 2021; this means that members will continue to be “locked in” to coverage past FY 2020-21. Therefore, the Department of Health Care Policy and Financing (the Department) has updated the requirements of the Continuous Coverage (Continuous Eligibility) Performance Incentive to reflect the extension of the PHE and the focus on those enrolled in vulnerable eligibility groups.

Information/Procedure:

Each county will use the CBMS County COVID-19 Locked-In Report to identify the individuals enrolled in vulnerable eligibility groups that are currently locked into coverage due to the PHE.

1. Each county should research individuals on the report with the aid codes listed below and resolve the reason for those individual’s locked-in status, where possible. If the county is unable to resolve the reason for the individual’s locked-in status, the county will document the root cause(s) of why the individual was locked into coverage on the Tracking Template provided by the Department. This includes members who are appropriately locked-in and members who the county is unable to resolve but should be eligible.
2. Each county should research individuals on the report and work on the termination reason: Failed to Provide Verifications. For individuals with this termination reason that are unable to be resolved, the county shall complete the attached Tracking Template that documents strategies counties utilize when resolving individuals on the report and identifies trends observed in the resolution process that the Department should be aware of.
 - a) Resolving cases includes reaching out to members to support them in obtaining any missing documentation that caused a termination force pass and reviewing cases for potential system issues or data entry errors.
 - b) Resolving cases means that member’s eligibility may change from a “force pass” (termination) to a “pass” and falling off of the COVID Locked-in Report. If members truly continue to be ineligible after review, they will remain on the COVID Locked-in Report.

Instruction

This is a blank version of the COVID Locked-in report with the added columns in green. Following is the process for the template:

- Pull your county's COVID Locked-in report
- Copy/paste data into the appropriate columns (A-T)
 - The data can be only the records that were worked by your team; the template doesn't have to be your entire report.
 - All fields in columns A-T do not have to be populated. For example, if there are MAGI cases being worked, we would not expect column O "Facility" to be populated. Another example is filtering out data to eliminate "noise" for your team to work. The most important information to have is the identifying case information, termination reasons and the new columns added.
- As workers review cases, update results in the **Results** column (U)
 - Cleared = Record updated to make member eligible, no longer force passing, and falling off the COVID Locked-in report
 - Valid = Record reviewed but determined to be correctly force passing and remaining on the COVID Locked-in report
 - Other = Other reasons that don't fit above reasons
- Update the **Reason** column (V)
 - This is dynamic based on selection in the Results column
 - These are the top reasons workers have found for either cleared or valid records
- Additional Comments column (W)
 - Optional field for comments that may seem pertinent to the review of the record
- The table within columns Z-AB is there only for reference of the values. Please do not change these.

The Tracking Template is due on the **5th of June and July, for two submissions total**. Submit the Tracking Template to HCPFCountyRelations@state.co.us.

Vulnerable Eligibility Groups subject to research and resolution

The vulnerable eligibility groups subject to research and resolution, where possible, include the following aid codes: HCBS (BI, CCT, CES, CH, CBS, CHRP, CLLI, CMHS, DD, EBD, SCI, SLC), PACE, NF/ Hospital 300% Institutionalized, Buy-In CBwD, Buy-In WAwD, Eligible Needy Newborn, and CHP+ Newborn. However, if a county has a low number of individuals on the report, the county may be assigned additional aid codes to research and resolve, based on the Department's direction.

Monitoring Compliance

To be eligible for the FY 2020-21 Continuous Coverage (Continuous Eligibility) Performance Incentive, the county must submit June and July Tracking Template by the

required due date (on the 5th of the month). Compliance will be determined based on whether the county submitted 100% of the COVID Incentive Tracking Templates timely.

The final Status Report will be shared with Directors and Secondary Directors through existing processes.

Contract Language

Contract Language for the Continuous Eligibility Performance Incentive found in the [FY 2020 –21 County Incentives Contract](#) in section 4.6 is hereby updated through this Operational Memo 21- 041 Compliance with the Continuous Coverage (Continuous Eligibility) Performance Incentive will be determined utilizing the guidance issued in Operational Memo 21-041.

COVID-related Guidance

Guidance issued to manage the COVID-19 Locked-In Report can be found on the Department's [County COVID Resources](#) webpage.

Attachment(s):

COVID Incentive Tracking Template

Department Contact:

HCPFCountyRelations@state.co.us